

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NICHOLAS BALSAMO, and DORLA
STEWART, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

CAESARS ENTERTAINMENT, INC., a
Delaware corporation,

Defendant.

Case No. 2:24-cv-00043-APG-NJK

Judge: Hon. Andrew P. Gordon

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO COMPLY
WITH LOCAL RULE IA 11-2**

Plaintiff Nicholas Balsamo ("Plaintiff") hereby moves for an extension of time for Thiago M. Coelho and Shahin Rezvani of Wilshire Law Firm, PLC to comply with Local Rule IA 11-2.¹ See Court's Notice, ECF No. 18.

Good cause exists for this request. On December 26, 2023, this matter was ordered transferred from United States Central District of California to the Honorable Anne R. Traum, United States District Court of Nevada. (ECF No. 16.) On January 5, 2024, it was instead assigned to Your Honor whose pending order to transfer to Judge Traum is set for February 2, 2024. Plaintiff

¹ Only Mr. Coelho and Mr. Rezvani of Wilshire Law Firm intend to appear *pro hac vice* in this matter. Jennifer M. Leinbach, Jesenia A. Martinez, and Jesse S. Chen, do not currently intend to appear *pro hac vice* here. Should this change, the attorneys will promptly comply with Local Rule IA 11-2. Therefore, Ms. Leinbach, Ms. Martinez, and Mr. Chen will not be submitting their Verified Petitions and the Court's Notices requiring their completion must be discharged.

respectfully requests an extension to comply with Local Rule IA 11-2 so that the petitions may rightfully be before Judge Traum.

Further, Plaintiff retained local counsel Seth Bayles of Bayles Law Group, PLLC and Mr. Coelho and Mr. Rezvani have begun to complete their respective Verified Petitions, however, are unable to file their respective Verified Petitions as they are awaiting receipt of their Certificates of Good Standing, which have been ordered and their imminent arrival is expected. In addition, due to travel and hearing commitments, Mr. Coelho has been unable to secure the notarization of his Verified Petition. Mr. Coelho expects that he will be able to secure a notary by the time the Certificate of Good Standing is received.

This extension is not being sought to delay or prejudice any other party as no other party has yet to enter an appearance.

Thus, for these reasons, Plaintiffs respectfully request an extension of two weeks from the date of transfer to the Honorable Anne R. Traum, up to and including February 16, 2024, to submit Mr. Coelho's and Mr. Rezvani's Verified Petitions in compliance with Local Rule IA 11-2.

Dated: January 19, 2024

Respectfully submitted,

By: s/ Thiago M. Coelho

Thiago M. Coelho

Shahin Rezvani

(will comply with L.R. IA 11-2 within 14 days
of transfer)

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IT IS SO ORDERED:

Dated: January 23, 2024

Counsel for Plaintiff Nicholas Balsamo



ANDREW P. GORDON